

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CHASTITY PENDELTON, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
JOSEPH KENNETH STAGEMAN, )  
Individually and as agent for ELEMENT )  
FLEET CORPORATION d/b/a GELCO )  
CORP., GELCO CORP, and ELEMENT )  
VEHICLE MANAGEMENT SERVICES, )  
LLC, and ELEMENT FLEET )  
CORPORATION d/b/a GELCO CORP, )  
GELCO CORP, and ELEMENT VEHICLE )  
MANAGEMENT SERVICES, LLC. )  
 )  
Defendants. )  
 )

**NOTICE OF REMOVAL**

NOW COMES the defendants, JOSEPH KENNETH STAGEMAN, Individually, incorrectly sued as an agent of ELEMENT FLEET CORPORATION d/b/a GELCO CORP., GELCO CORP, and ELEMENT VEHICLE MANAGEMENT SERVICES, LLC; ELEMENT FLEET CORPORATION d/b/a GELCO CORP, GELCO CORP; and ELEMENT VEHICLE MANAGEMENT SERVICES, LLC, by its attorneys, Alan Schumacher and Michael Barry of PRETZEL & STOUFFER, CHARTERED, and hereby removes this civil action, case number 2019 L 005240 from the Circuit Court of Cook County, State of Illinois, to the United States District Court for the North District of Illinois, Eastern Division, pursuant to 28 USC §§ 1441 and 1332. In support thereof, the defendants state as follow:

1. This civil action regarding an automobile accident was commenced against the named defendants in the Circuit Court of Cook County, State of Illinois, on May 14, 2019. (See Complaint, attached hereto as Exhibit A).

2. The Complaint was served through the Illinois Secretary of State on the defendant Stageman on June 14, 2019. (See Summons, attached hereto as Exhibit B). As to the defendants Element Fleet Corporation, Gelco Corporation, and Element Fleet Vehicle Management Services, LLC, they were served in Maryland on June 20, 2019. (See Summons, attached hereto as Group Exhibit C).

3. This notice is filed within the time period permitted pursuant to 28 USC §§ 1441 and Fed. R. Civ P. Rule 6(a)(1)(C).

4. Any civil action brought in a state court of which the District Courts of the United States have original jurisdiction may be removed by the defendant to the district court of the United States for the district and division embracing the place where such action is pending. 28 USC §1441.

5. The district courts shall have original jurisdiction of all civil actions where the amount in controversy exceeds \$75,000.00, exclusive of interest and costs, and where there is complete diversity. 28 USC §1332. There is complete diversity when, at the time that the action was commenced, every plaintiff is of diverse citizenship as every defendant. *Id.*

6. As to the plaintiff, the complaint does not set for an allegation as to her residence. Upon information and belief, the plaintiff's current address is 4812 Indigo Place, Roscoe, IL 61073-6002. At the time the incident, the plaintiff's mailing address was in Elgin, Illinois. (See Illinois Traffic Crash Report attached hereto as Exhibit D).

7. As to defendant Stageman, he is a resident of the state of Wisconsin and was so at the time of the traffic accident. (See Illinois Traffic Crash Report. (See Exhibit D)).

8. At the time the action commenced, the defendant Element Fleet Corporation was and is now incorporated in Delaware with its principal place of business in Maryland. (See affidavit of Christine Morris, attached hereto as Exhibit E). The defendant Gelco Corp was and is now incorporated in Minnesota with its principal place of business in Maryland. (See Exhibit E). The defendant Element Vehicle Management Services, LLC was and is now incorporated in Delaware with its principal place of business in Maryland. (See Exhibit E). Element Vehicle Management Services, LLC is a fully owned subsidiary of Element Fleet Corporation. (See Exhibit E).

9. “All corporations are treated alike for diversity purposes: all are citizens both of the state of incorporation and the state in which the corporation has its principal place of business.” *Wise v. Wachovia Securities, LLC*, 450 F.3d 265, 267 (7th Cir. 2006). Accordingly, the corporate defendants are deemed to be citizens of the State of Delaware, Minnesota, and Maryland, and complete diversity exists in this case.

11. The defendants have a good faith basis to believe that the amount in controversy exceeds the jurisdictional amount of \$75,000, exclusive of interest and costs. The plaintiff’s request for relief requests a judgment in excess of \$100,0000. (See Exhibit A, plaintiff’s prayer for relief). Upon this information, there is a good faith basis to assert that the amount in controversy exceeds the jurisdictional amount.

12. Therefore, the United States District Courts have original jurisdiction for this civil action under 28 USC §1332 because there is complete diversity and the amount in controversy could exceed \$75,000.00.

13. This Notice of Removal is filed in the United States District Court for the Northern District of Illinois, Eastern Division, which is the district and division in which the State action is pending.

14. Pursuant to 28 U.S.C. § 1446(d), the defendants shall file a copy of this Notice of Removal with the Clerk of the Circuit Court of Cook County, State of Illinois, and serve the plaintiff with this Notice of Removal promptly after filing this Notice.

WHEREFORE, the defendants pray that this cause be removed to the United States District Court for the Northern District of Illinois, Eastern Division, for the reasons set forth above.

Respectfully submitted,

/s/ Michael A. Barry

Michael A. Barry - 6295841

PRETZEL & STOUFFER, CHARTERED

One S. Wacker Drive

Suite 2500

Chicago, IL 60606

Telephone: (312) 578-7865

Fax: (312) 346-8242

[mbarry@pretzelstouffer.com](mailto:mbarry@pretzelstouffer.com)

*Attorney for Defendants*

**CERTIFICATE OF SERVICE**

A copy of the **Notice of Removal and Attestation** was filed electronically this **22nd** day of July, 2019. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the court's electronic system.

**ATTORNEY FOR PLAINTIFF**

Law Offices of Gregory A. Harris  
368 W. Huron Street – Suite 200N  
Chicago, IL 60654  
312-624-9979  
Attorney # 31955  
[greg@gaharrislaw.com](mailto:greg@gaharrislaw.com)

/s/ Michael A. Barry  
Michael A. Barry - 6295841  
PRETZEL & STOUFFER, CHARTERED  
One S. Wacker Drive  
Suite 2500  
Chicago, IL 60606  
Telephone: (312) 578-7865  
Fax: (312) 346-8242  
[mbarry@pretzelstouffer.com](mailto:mbarry@pretzelstouffer.com)  
*Attorney for Defendants*

12-Person Jury

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT - LAW DIVISION

FILED  
5/14/2019 4:58 PM  
DOROTHY BROWN  
CIRCUIT CLERK  
COOK COUNTY, IL

2019L005240

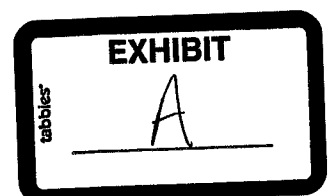
CHASTITY PENDELTON, )  
)  
)  
Plaintiff, )  
vs. ) No.  
)  
JOSEPH KENNETH STAGEMAN, )  
individually and as agent for ELEMENT )  
FLEET CORPORATION d/b/a GELCO )  
CORP., GELCO CORP, and ELEMENT )  
VEHICLE MANAGEMENT SERVICES, )  
LLC, and ELEMENT FLEET )  
CORPORATION d/b/a GELCO CORP., )  
GELCO CORP, and ELEMENT VEHICLE )  
MANAGEMENT SERVICES, LLC., )  
)  
Defendants. )

COMPLAINT AT LAW

COUNT I

Now comes Plaintiff, CHASTITY PENDELTON, by and through her attorneys, the LAW OFFICES OF GREGORY A. HARRIS, and complaining of Defendant, JOSEPH KENNETH STAGEMAN, ("STAGEMAN") individually, and as agent for ELEMENT FLEET CORPORATION d/b/a GELCO CORP., GELCO CORP, and ELEMENT VEHICLE MANAGEMENT SERVICES, LLC, (Collectively "GELCO"), states as follows:

1. On or about July 18, 2017, Plaintiff, CHASTITY PENDELTON, was operating a vehicle which was traveling westbound on I-94 at or near milepost 25, Township of Deerfield, Lake County, State of Illinois.



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2. On or about July 18, 2017, Defendant, STAGEMAN, was operating a vehicle owned by GELCO, which was traveling westbound on I-94 at or near milepost 25, Township of Deerfield, Lake County, State of Illinois.
3. At all relevant times, STAGEMAN, was acting as an agent, employee and servant of GELCO.
4. That at all times mentioned herein, Plaintiff was in the exercise of due care for her own safety.
5. That at all times, it was the duty of the Defendant to operate said vehicle so as not to negligently injure Plaintiff.
6. Defendant, notwithstanding this duty, was guilty of one or more of the following acts or omissions:
  - a) Carelessly and negligently failed to maintain a reasonably careful lookout;
  - b) Carelessly and negligently operated and controlled said vehicle;
  - c) Carelessly and negligently drove said vehicle at a speed greater than reasonable and proper under the circumstances and in violation of Section 11-601, Chapter 95 1/2 of the Illinois Revised Statutes;
  - d) Carelessly and negligently failed to reduce the speed of said vehicle, when Defendant could or should have seen Plaintiff's vehicle;
  - e) Failed to yield the right of way to Plaintiff's vehicle;
  - f) Failed to operate said vehicle in such a fashion as to avoid it from colliding with the Plaintiff's vehicle;
  - g) Failed to warn the Plaintiff that a collision was imminent;

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h) Was otherwise careless and negligent.

7. That as a direct and proximate result of one or more of the foregoing negligent acts or omissions by the Defendant, the vehicle driven by the Defendant was caused to strike with great force and violence Plaintiff's vehicle.

8. As a direct and proximate result of the collision, Plaintiff suffered serious and permanent injuries both internally and externally; suffered great pain and anguish, and will so suffer in the future.

9. As a result of the collision, Plaintiff was compelled to expend sums of money to be cured of her injuries and will continue to so spend in the future for that purpose; and was hindered and delayed in her hobbies and occupation.

WHEREFORE, Plaintiff, CHASTITY PENDELTON, requests a judgment against Defendant, JOSEPH KENNETH STAGEMAN, in a sum in excess of ONE HUNDRED THOUSAND and 00/100 (\$100,000.00) DOLLARS.

### COUNT II

Now comes Plaintiff, CHASTITY PENDELTON, by and through her attorneys, the LAW OFFICES OF GREGORY A. HARRIS, and complaining of Defendants, ELEMENT FLEET CORPORATION d/b/a GELCO CORP., GELCO CORP, and ELEMENT VEHICLE MANAGEMENT SERVICES, LLC, (Collectively "GELCO"), states as follows:

1. On or about July 18, 2017, Plaintiff, CHASTITY PENDELTON, was operating a vehicle which was traveling westbound on I-94 at or near milepost 25, Township of Deerfield, Lake County, State of Illinois.

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2. On or about July 18, 2017, Defendant, GELCO, by and through its agent, employee and servant, STAGEMAN, owned and was operating a vehicle which was traveling westbound on I-94 at or near milepost 25, Township of Deerfield, Lake County, State of Illinois.

3. At all relevant times, STAGEMAN, was acting as an agent, employee and servant of GELCO.

4. That at all times mentioned herein, Plaintiff was in the exercise of due care for her own safety.

5. That at all times, it was the duty of the Defendants to operate said vehicle, by and through its agent, employee and servant, so as not to negligently injure Plaintiff.

6. Defendants, by and through their agent, employee and servant, notwithstanding this duty, were guilty of one or more of the following acts or omissions:

- a) Carelessly and negligently failed to maintain a reasonably careful lookout;
- b) Carelessly and negligently operated and controlled said vehicle;
- c) Carelessly and negligently drove said vehicle at a speed greater than reasonable and proper under the circumstances and in violation of Section 11-601, Chapter 95 1/2 of the Illinois Revised Statutes;
- d) Carelessly and negligently failed to reduce the speed of said vehicle, when Defendant could or should have seen Plaintiff's vehicle;
- e) Failed to yield the right of way to Plaintiff's vehicle;
- f) Failed to operate said vehicle in such a fashion as to avoid it from colliding with the Plaintiff's vehicle;
- g) Failed to warn the Plaintiff that a collision was imminent;

h) Was otherwise careless and negligent.

7. Defendants, notwithstanding this duty, were guilty of one or more of the following acts or omissions:

- a) Failed to properly train co-Defendant, STAGEMAN, in the operation of the vehicle;
- b) Failed to properly supervise co-Defendant, STAGEMAN, in the operation of the vehicle;

8. That as a direct and proximate result of one or more of the foregoing negligent acts or omissions by the Defendants, by and through their agent, employee and servant, the vehicle driven by STAGEMAN was caused to strike with great force and violence Plaintiff's vehicle.

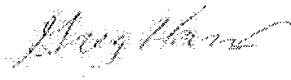
9. As a direct and proximate result of the collision, Plaintiff suffered serious and permanent injuries both internally and externally; suffered great pain and anguish, and will so suffer in the future.

10. As a result of the collision, Plaintiff was compelled to expend sums of money to be cured of her injuries and will continue to so spend in the future for that purpose; and was hindered and delayed in her hobbies and occupation.

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WHEREFORE, Plaintiff, CHASTITY PENDELTON, requests a judgment against Defendants, ELEMENT FLEET CORPORATION d/b/a GELCO CORP., GELCO CORP, and ELEMENT VEHICLE MANAGEMENT SERVICES, LLC, (Collectively "GELCO"), in a sum in excess of ONE HUNDRED THOUSAND and 00/100 (\$100,000.00) DOLLARS.

Respectfully submitted,



\_\_\_\_\_  
Attorney for Plaintiff, CHASTITY  
PENDELTON

Law Offices of Gregory A. Harris  
368 W. Huron St. - Suite 200N  
Chicago, IL 60654  
(312) 624-9979  
Attorney # 31955  
greg@gaharrislaw.com



## OFFICE OF THE SECRETARY OF STATE

JESSE WHITE • Secretary of State

June 14, 2019

Law Offices of Gregory A. Harris  
368 West Huron Street, Suite 200N  
Chicago, IL 60654

Dear Sir or Madam:

Copies of Summons(es), Complaint(s) at Law, and Affidavit(s) of Compliance with proper fee(s) have been received on the following:

**Chastity Pendelton v. Joseph Kenneth Stageman, #19 L 5240, Fee \$5.00**

Filing and Service have been accepted on 6/14/2019 in compliance with the provisions of 625 ILCS 5/10-301 or provisions of 735 ILCS 5/2-203.1 as applicable.

Sincerely,

A handwritten signature in cursive script that reads "Jesse White".

Jesse White  
Secretary of State

**ALL INQUIRIES CALL:**

(217)785-3096

Office of the General Counsel  
298 Howlett Building  
Springfield, IL 62756

JW:tf

Enclosure

FILED DATE: 5/14/2019 4:58 PM 2019L005240

FILED  
5/14/2019 4:58 PM  
DOROTHY BROWN  
CIRCUIT CLERK  
COOK COUNTY, IL

2019L005240

2120 - Served                      2121 - Served  
 2220 - Not Served              2221 - Not Served  
 2320 - Served By Mail        2321 - Served By Mail  
 2420 - Served By Publication 2421 - Served By Publication  
 Summons - Alias Summons

(08/01/18) CCG 0001 A

## IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

CHASTITY PENDELTON

(Name all parties)

v.

JOSEPH KENNETH STAGEMAN, et al

Case No. \_\_\_\_\_

Joseph Kenneth Stageman  
3601 County Road O  
Saukville, WI 53080☒ SUMMONS    ☐ ALIAS SUMMONS

To each Defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance and pay the required fee **within thirty (30) days after service of this Summons**, not counting the day of service. To file your answer or appearance you need access to the internet. Please visit [www.cookcountyclerkofcourt.org](http://www.cookcountyclerkofcourt.org) to initiate this process. Kiosks with internet access are available at all Clerk's Office locations. Please refer to the last page of this document for location information.

If you fail to do so, a judgment by default may be entered against you for the relief requested in the complaint.

To the Officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than thirty (30) days after its date.

Dorothy Brown, Clerk of the Circuit Court of Cook County, Illinois  
[cookcountyclerkofcourt.org](http://cookcountyclerkofcourt.org)

## Summons - Alias Summons

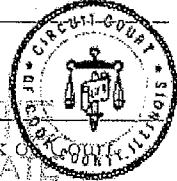
(08/01/18) CCG 0001 B

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/FAQ/gethelp.asp>, or talk with your local circuit clerk's office. 5/14/2019 4:58 PM DOROTHY BROWN

Atty. No.: 31955  
 Atty Name: Gregory A. Harris  
 Atty. for: Plaintiff  
 Address: 368 W. Huron St, Ste 200N  
 City: Chicago  
 State: IL Zip: 60654  
 Telephone: 312-624-9979  
 Primary Email: greg@gaharrislaw.com

Witness: \_\_\_\_\_

\_\_\_\_\_  
 DOROTHY BROWN, Clerk of  
 SECRETARY OF STATE



Date of Service: JUN 14 2019  
 (To be inserted by officer on copy left with  
 Defendant or other person):  
 AMT \$9.00

FILED DATE: 5/14/2019 4:58 PM 2019L005240

Dorothy Brown, Clerk of the Circuit Court of Cook County, Illinois  
[cookcountyclerkofcourt.org](http://cookcountyclerkofcourt.org)

FILED DATE: 5/14/2019 4:58 PM 2019L005240

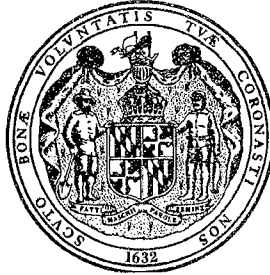
# CLERK OF THE CIRCUIT COURT OF COOK COUNTY OFFICE LOCATIONS

- Richard J Daley Center  
50 W Washington  
Chicago, IL 60602
  - District 2 - Skokie  
5600 Old Orchard Rd  
Skokie, IL 60077
  - District 3 - Rolling Meadows  
2121 Euclid  
Rolling Meadows, IL 60008
  - District 4 - Maywood  
1500 Maybrook Ave  
Maywood, IL 60153
  - District 5 - Bridgeview  
10220 S 76th Ave  
Bridgeview, IL 60455
  - District 6 - Markham  
16501 S Kedzie Pkwy  
Markham, IL 60428
  - Domestic Violence Court  
555 W Harrison  
Chicago, IL 60607
  - Juvenile Center Building  
2245 W Ogden Ave, Rm 13  
Chicago, IL 60602
  - Criminal Court Building  
2650 S California Ave, Rm 526  
Chicago, IL 60608
  - Domestic Relations Division  
Richard J Daley Center  
50 W Washington, Rm 802  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Civil Appeals  
Richard J Daley Center  
50 W Washington, Rm 801  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Criminal Department  
Richard J Daley Center  
50 W Washington, Rm 1006  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - County Division  
Richard J Daley Center  
50 W Washington, Rm 1202  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Probate Division  
Richard J Daley Center  
50 W Washington, Rm 1202  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Law Division  
Richard J Daley Center  
50 W Washington, Rm 801  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Traffic Division  
Richard J Daley Center  
50 W Washington, Lower Level  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
- Daley Center Divisions/Departments**
- Civil Division  
Richard J Daley Center  
50 W Washington, Rm 601  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm
  - Chancery Division  
Richard J Daley Center  
50 W Washington, Rm 802  
Chicago, IL 60602  
Hours: 8:30 am - 4:30 pm

# Baltimore City Sheriff's Office

John W. Anderson, Sheriff

Main Office  
The Clarence Mitchell Courthouse  
100 N. Calvert Street  
Baltimore, Maryland 21202  
Phone: 410-396-1155  
Fax: 410-727-3507



District Court Office  
111 N. Calvert Street  
Baltimore, Maryland 21202  
Phone: 410-396-7412  
Fax: 410-396-7439

June 27, 2019

STATE MARYLAND  
CITY of BALTIMORE

**Re: Chastity Pendelton vs. Joseph Kenneth Stageman**

I, D. Field (0395), Process Server of Baltimore City Sheriff's Office, State of Maryland being duly sworn depose and say that I am over the age of twenty-one year, not a party to this action.

On June 20, 2019 at 10:35am, hand to hand serve the Summons to Gelco Corp. c/o SCS-Lawyers Inc. Service Co., 7 St. Paul Street, Ste. 820, Baltimore, Maryland 21202.

D. Field (0395)

Process Server

A handwritten signature in black ink, appearing to read "John W. Anderson", is written over a horizontal line.

John W. Anderson, Sheriff

Subscribed to and sworn to before  
me this 27<sup>th</sup> day of June, 2019

A handwritten signature in black ink, appearing to read "Althea F. Bell", is written over a horizontal line.

Althea F. Bell

My Commission Expires July 08, 2019

EXHIBIT

C

## Baltimore City Sheriff's Office

John W. Anderson, Sheriff<sup>1</sup>

Main Office  
The Clarence Mitchell Courthouse  
100 N. Calvert Street  
Baltimore, Maryland 21202  
Phone: 410-396-1155  
Fax: 410-727-3507



District Court Office  
111 N. Calvert Street  
Baltimore, Maryland 21202  
Phone: 410-396-7412  
Fax: 410-396-7439

June 27, 2019

STATE MARYLAND  
CITY of BALTIMORE

**Re: Chastity Pendelton vs. Joseph Kenneth Stageman**

I, R. Deadwyler (9869), Process Server of Baltimore City Sheriff's Office, State of Maryland being duly sworn depose and say that I am over the age of twenty-one year, not a party to this action.

On June 24, 2019 at 10:20a, hand to hand serve the Summons and Complaint to Element Vehicle Management Services, c/o SCS-Lawyers Inc. Service Co., 7 St. Paul Street, Ste. 820, Baltimore, Maryland 21202

R. Deadwyler (9869)

Process Server

A black and white photograph of a signature stamp. The stamp is rectangular and contains the name "John W. Anderson" in a stylized, bold font. The background of the stamp is dark and textured.

John W. Anderson, Sheriff

Subscribed to and sworn to before  
me this 27<sup>th</sup> day of June, 2019

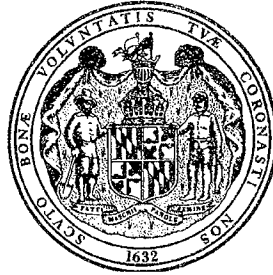
A black and white photograph of a handwritten signature. The signature is written in cursive and appears to be "Althea F. Bell". It is written on a line that extends across the page.

Althea F. Bell  
My Commission Expires July 08, 2019

# Baltimore City Sheriff's Office

John W. Anderson, Sheriff

Main Office  
The Clarence Mitchell Courthouse  
100 N. Calvert Street  
Baltimore, Maryland 21202  
Phone: 410-396-1155  
Fax: 410-727-3507



District Court Office  
111 N. Calvert Street  
Baltimore, Maryland 21202  
Phone: 410-396-7412  
Fax: 410-396-7439

June 27, 2019

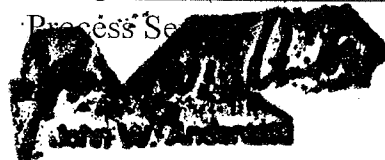
STATE MARYLAND  
CITY of BALTIMORE

**Re: Chastity Pendelton vs. Joseph Kenneth Stageman**

I, D. Field (0395), Process Server of Baltimore City Sheriff's Office, State of Maryland being duly sworn depose and say that I am over the age of twenty-one year, not a party to this action.

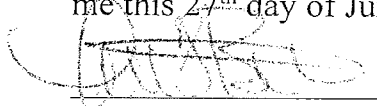
On June 20, 2019 at 10:35am, hand to hand serve the Summons to Element Fleet Corp., c/o SCS-Lawyers Inc. Service Co., 7 St. Paul Street, Ste. 820 Baltimore, Maryland 21202

D. Field (0395)

Process Server  
  
John W. Anderson

John W. Anderson, Sheriff

Subscribed to and sworn to before  
me this 27<sup>th</sup> day of June, 2019

  
Althea F. Bell

My Commission Expires July 08, 2019

**rabbits\***

# EXHIBIT

D

A Diagram and Narrative are required on all Type B crashes, even if units have been moved prior to the officer's arrival.

#### NARRATIVE (Refer to vehicle by Unit No.)

Unit 1 and unit 2 were traveling on I-84 W/B at milepost 25 in lane 1. Unit 1 was traveling behind unit 2. Unit 2 was traveling straight ahead and slowed for traffic, unit 1 failed to stop in time and struck unit 2's rear with the front of unit 1.

#### LOCAL USE ONLY

U 1 Color	WHITE	U 2 Color	WHITE
U 1 Towed by / to		U 2 Towed by / to	

#### COMMERCIAL MOTOR VEHICLE (CMV)

IF MORE THAN ONE CMV IS INVOLVED, USE SR 1050A ADDITIONAL UNITS FORMS.

A CMV is defined as any motor vehicle used to transport passengers or property and:

1. Has a weight rating of more than 10,000 pounds (example: truck or truck/trailer combination); or
2. Is used or designed to transport more than 15 passengers, including the driver (example: shuttle or charter bus); or
3. Is designed to carry 15 or fewer passengers and operated by a contract carrier transporting employees in the course of their employment (example: employee transporter - usually a van-type vehicle or passenger car); or
4. Is used or designated to transport between 9 and 15 passengers, including the driver, for direct compensation (example: large van used for specific purpose); or
5. Is any vehicle used to transport any hazardous material (HAZMAT) that requires placarding (example: placards will be displayed on the vehicle).

CARRIER NAME			
ADDRESS			
CITY/STATE/ZIP			
USDOT NO.	ILCC NO.		
Source of above info:	<input type="checkbox"/> Side of Truck	<input type="checkbox"/> Papers	<input type="checkbox"/> Log Book
Gross Vehicle Weight Rating (GVWR)			
Were HAZMAT placards displayed on the vehicle?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> UNK
If yes, name on placard			
4-digit UN no.	1-digit Hazard Class no.		
Did HAZMAT spill from the vehicle (do not consider fuel from the vehicle's own tank)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> UNK
Did HAZMAT Regulations violation contribute to the crash?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> UNK
Did Motor Carrier Safety Regulations (MCS) violation contribute to the crash?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> UNK
Was a Driver/Vehicle Examination Report form completed?			
HAZMAT	<input type="checkbox"/> Y	<input type="checkbox"/> N	Out of Service? <input type="checkbox"/> Y <input type="checkbox"/> N
MCS	<input type="checkbox"/> Y	<input type="checkbox"/> N	Out of Service? <input type="checkbox"/> Y <input type="checkbox"/> N
Form No.			
IDOT PERMIT NO.	WIDE LOAD? <input type="checkbox"/> Y <input type="checkbox"/> N		
TRAILER WIDTH(S):	0-96"	97-102"	> 102"
TRAILER 1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TRAILER 2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TRAILER LENGTH(S):	1	2	3
TOTAL VEHICLE LENGTH	ft. NO. OF AXLES		
SELECT CODES FROM BACK COVER OF CRASH BOOKLET:			
VEHICLE CONFIGURATION			
CARGO BODY TYPE			
LOAD TYPE			

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

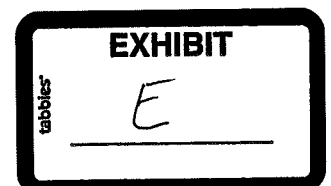
CHASTITY PENDELTON, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
JOSEPH KENNETH STAGEMAN, )  
Individually and as agent for ELEMENT )  
FLEET CORPORATION d/b/a GELCO )  
CORP., GELCO CORP, and ELEMENT )  
VEHICLE MANAGEMENT SERVICES, )  
LLC, and ELEMENT FLEET )  
CORPORATION d/b/a GELCO CORP, )  
GELCO CORP, and ELEMENT VEHICLE )  
MANAGEMENT SERVICES, LLC. )  
 )  
Defendants. )  
 )

**AFFIDAVIT**

I, Christine Morris, being first duly sworn upon her oath, deposes and says:

That this AFFIDAVIT is made upon my personal knowledge and if I were sworn as a witness at the trial of the above-captioned lawsuit, I could competently testify to the following facts:

1. I am an individual over the age of 18, of sound mind and body, and have personal knowledge of the facts contained in this affidavit.
2. I am the Legal Support Administrator for Element Fleet Management. My office is located at 940 Ridgebrook Road, Sparks, Maryland 21152.
3. Gelco Corp. was a Delaware Corporation, and was purchased by Element Fleet Corporation on September 1, 2015.
4. On January 1, 2018, Gelco Corp. changed its name to Element Fleet Corporation. Element Fleet Corporation provides fleet management services for commercial vehicle fleets.



5. Element Fleet Corporation was and is now incorporated in Delaware with its principal place of business in Maryland.
6. Gelco Corp is currently incorporated in Minnesota with its principal place of business in Maryland.
7. Element Vehicle Management Services, LLC is doing business as Element Fleet Management. Element Vehicle Management Services, LLC was and is now incorporated in Delaware with its principal place of business in Maryland. Element Vehicle Management Services, LLC operates as a fully owned subsidiary of Element Fleet Corporation. Element Fleet Corporation is the only member of the LLC.

Further Declarant saith not.

I, Christine Morris, declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 22, 2019

  
Christine Morris